

Maintenance Memorandum

Date: September, 1998

Subject: **Guidance for Storage of Empty Drums**

When storing empty drums for use in maintenance activities, there are “good” practices and “bad” practices. The bad practices include storing large numbers of so-called empty drums in a random fashion, on the back area of a facility yard, in a way that precipitation can get into the drums, potentially overflowing onto the ground or in a way that allows paint chips, emulsion, fuel oil, or other materials to spill onto the ground. In some instances in the “old days” these drums were even stored in wet areas where the drums were constantly exposed to moisture, allowing materials to leach into the water and potentially into the soil.

Recommendations for “good” storage are as follows:

1. Only keep as many drums as you will use in the immediate future (within the next year). Long term outdoor storage of drums you intend to use “some day” eventually leads to rusty drums which will have limited usefulness anyway. Minimize the number.
2. If possible, keep drums stored neatly under cover and on a hard surface rather than on bare soil out on the back lot. While doing this, be sure that drums are stored in such a way that they do not present a fire hazard, are not in the way, and do not give off excessive vapors where people can be exposed. If drums must be stored outside, be sure they are tightly closed or otherwise stored to keep out precipitation, and to avoid losing any material (paint chips, etc.) to the ground surface. Do not store above bare soil.
3. Be sure that the drums are obviously empty to someone such as a regulatory person who may be inspecting your operation. If it isn’t obvious that all the drums are empty, for instance because they have lids on, please be sure they are labeled as empty.
4. Get rid of rusty, banged up drums.
5. Be sure empty drums aren’t labeled as hazardous waste.

Denny Parshall
Environmental Auditor
Project Planning Division
Bureau of Planning